



# CESA 8 MEMORANDUM

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Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

April 23, 2012

In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
	)	
Federal-State Joint Board on Universal	)	CC Docket No. 96-45
Service	)	
	)	WC Docket No. 12-23
Advancing Broadband Availability Through	)	
Digital Literacy Training	)	

Dear Sir/Madame:

I am writing today in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes a Digital Literacy Pilot to fund schools and libraries operating digital literacy training courses. Before delving into my response to the proposed pilot, I want to be sure to thank the FCC for your continued support for the E-Rate program. The E-Rate program provides critical discounts to assist schools like those in my service area (27 rural and poor schools in North East Wisconsin) to obtain affordable telecommunications and internet access.

Without E-Rate dollars, it would be impossible for my fiscally challenged schools to afford the level of internet service they now have. E-Rate dollars reduce the cost of the connections which is very important because we don't have any competition helping to keep those costs down.

The planned pilot would provide grants to K-12 schools and libraries, lasting four years, to hire trainers, conduct training courses and provide resources/materials to those who lack digital literacy skills. While the FCC does not propose to fund the pilot using E-Rate funds, it does propose implementing and administering the program through the same division that oversees the E-Rate program. Specifically, the FCC proposes implementing/administering the program through the Schools & Libraries Division of the Universal Service Administrative Company (USAC).

I am concerned that operating this pilot through E-Rate will undermine the important and ongoing work of E-Rate, causing delays in the program's application and appeal processes, creating auditing problems and results in problematic precedents for E-Rate's eligible services. Specifically, I oppose the proposal to operate/administer the proposed pilot through the E-Rate program.

Again, slow service on E-Rate applications and dilution of the dollars could be distractive in rural schools and libraries already facing the impact of the worst recession in my 44 year educational career.

Thank you for considering my response as you move forward with your decision on the Digital Literacy Pilot. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by not funding the pilot with E-Rate funding. I urge you to take similar protective measures when it comes to the implementation and administration of the pilot; please ensure that critical, limited E-Rate resources—both fiscal and administrative—are protected.

Sincerely,



Dr. Bob Kellogg  
Agency Administrator

CC: Congressman Reid Ribble (via E-Mail)